

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Brillo Landfill - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region II

**Subject:** POLREP #2  
Action Memorandum Approved and Pre-mobilization Activities  
Brillo Landfill  
A27T  
Victory, NY  
Latitude: 43.1683611 Longitude: -76.6149088

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**From:** Mark Gallo, On-Scene Coordinator

**Date:** 6/7/2018

**Reporting Period:** February 22 - June 8, 2018

## 1. Introduction

### 1.1 Background

Site Number:	A27T	Contract Number:	EP-S2-15-01
D.O. Number:	0047	Action Memo Date:	4/9/2018
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	11/6/2017	Start Date:	10/19/2017
Demob Date:		Completion Date:	
CERCLIS ID:	NYN000203129	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

#### 1.1.1 Incident Category

CERCLA Removal Action (RV1) at a former non-hazardous waste Landfill.

#### 1.1.2 Site Description

The Site is a former, inactive, non-hazardous waste landfill approximately 113 acres in size which is overgrown and partially wooded with protected wetlands.

During the 1960s, plating waste from General Motors were believed to be disposed on the site on open ground and later covered with soil and seeded. In the 1970s and 80s, the owner operated a permitted non-hazardous, industrial waste landfill which received sewage treatment plant floatables and industrial grinding silica. Sometime prior to 1980, drums of waste were also deposited on site. In the early 1980s, these drums were removed as a condition of obtaining a non-hazardous waste disposal permit from the New York State Department of Environmental Conservation (NYSDEC). The permitted landfill closed in 1986.

During a 2015 NYSDEC remedial investigation sampling event at the Site, approximately 20 drums were uncovered in an area formerly believed to be a drum staging and disposal area. Historical information indicates the waste material may contain PCBs as well as plating wastes. On September 29, 2017 the NYSDEC requested EPA assistance to address the buried drums at the former drum staging and drum disposal areas which covers an approximate area of 0.5 to 0.75 acres.

#### 1.1.2.1 Location

The Brillo Landfill Site is located on the north side of State Route 370, just west of the Village of Cato, Cayuga County, New York.

Latitude 43.168349      Longitude -76.614948

#### 1.1.2.2 Description of Threat

There is a threat to groundwater from the release of wastes within buried drums at the Site. The initial EPA investigation identified several buried drums and drum carcasses in two areas of concern; former drum staging area and the former drum disposal area. Initial screening of several drums were observed to contain liquids which recorded elevated levels of volatile organic compounds (VOCs) (recorded by a photoionization detector) and elevated levels of LEL (Lower Explosive Level). Previous sampling of soil and groundwater by the NYSDEC, in the two areas of concern, has documented VOCs and PCBs to be present.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

In November of 2015, NYSDEC excavated test pits and collected samples at several areas of the 113-acre site. During the NYSDEC remedial investigation, the NYSDEC identified two areas of concern (Drum Staging Area and Drum Disposal Area) in which they uncovered buried drums. Initial screening of those drums reported elevated levels of VOCs. Samples were collected from soil around the buried drums which reported elevated levels of VOCs and PCBs. On September 29, 2017, the NYSDEC referred the two areas of concern to EPA for consideration of a CERCLA Removal Action.

On November 6, 2017, EPA mobilized to the Site with the support of EPA's Emergency and Rapid Response Services Contractor (ERRS) and the EPA's Removal Support Team Contractor (RST) to conduct its initial investigation of the buried drums. On November 7-8, 2017, EPA excavated five former NYSDEC test pit areas which resulted in access to and the sampling of 10 buried drums.

During this initial investigation and sampling event, EPA observed several buried drums and drum carcasses. Drums were observed to have been disposed in a hap-hazard manner, many partially crushed and/or damaged with few drums in upright positions and many drums laying horizontal and/or at varying degrees from upright position. Drums observed in the former drum staging area were found to be deposited at shallower depths and partially in or below the groundwater zone. Drums observed in the former drum disposal area showed less impacts from groundwater however drums in this area were also observed to be damaged and in varying stages of decay.

Both liquids and solids were sampled from the drums accessed during the initial investigation. Samples collected were submitted to an accredited laboratory for analysis. The requested analysis included the following;

- Target Compound List (TCL) for VOCs
- TCL semi-volatile organic compounds (SVOCs)
- Target Analyte List (TAL) for metals plus mercury, cyanide, and hexavalent chromium
- PCBs, Pesticides, and Herbicides
- Full Toxicity Characteristic Leaching Procedure (TCLP) for RCRA hazardous waste determination (VOCs, SVOCs, Pesticides, Herbicides, PCBs)
- RCRA Characteristics of Ignitability, Corrosivity, and Reactivity
- Target Organic Halide (TOX) analysis

At the completion of assessment and sampling activities, EPA secured or sealed all drums sampled and demarcated areas of known buried drums with orange fencing and/or marked areas with caution tape.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Response Actions to Date**

On February 22, 2018, EPA received the final sampling report and validated data from the November 2017 sampling event. EPA conducted a review of the data which reported that the contents from seven of the ten drums samples failed TCLP analysis. Six of the ten samples failed TCLP analysis for Trichloroethene (TCE), with one of those samples also reported as failing TCLP for Tetrachloroethylene (PCE). The 6 samples that failed the TCE TCLP analysis included reported levels from 0.88 mg/L to 2,800,000 mg/L. The RCRA regulatory level for TCE is 0.5 mg/L. The seventh sample failed TCLP analysis for chromium. That sample was reported at 29.3 mg/L and the regulatory level for chromium TCLP is 5.0 mg/L.

The contents from one of the drum samples, and the sample of the surrounding soil reported levels of PCBs exceeding the TSCA regulatory levels. The sample results from the drum contents and surrounding soil were 340 mg/kg (drum liquid) and 1,500 mg/kg (soil). Other hazardous constituents were also reported in the analytical report, but not above the RCRA regulatory levels. Additional hazardous constituents reported include but not limited to; toluene, xylene, ethylbenzene, and nickel.

Following the receipt and review of the analytical data from the November 2017 sampling event, EPA prepared an Action Memorandum to request an increase in funding to continue actions at the Site. The Action Memorandum was approved on April 9, 2018. On May 10, 2018 a task order modification was issued to the ERRS contractor that increased the project ceiling to \$100,000 to \$1,350,000.

On May 9-10, 2018, The EPA OSC conducted a Site walk with the DEC project manager. Both EPA and NYSDEC project manager also met with the Victory Town Supervisor to discuss the planned EPA removal action. EPA and DEC also met with two homeowners immediately adjacent to the Site to discuss the proposed project schedule and provide a basic understanding of the work to be performed at the Site.

On May 14, 2018, the EPA OSC issued a work order to the ERRS contractor to initiate pre-mobilization activities that included sourcing equipment, supplies, and other needed materials for Site work. ERRS worked to source and secure equipment and supplies for a Site mobilization target date of June 11, 2018.

#### **2.1.2 Enforcement Activities**

EPA continues working with the NYSDEC on possible enforcement actions related to this Site.

#### **2.1.3 Waste Disposition**

Nothing to report at this time

<b>Waste Stream</b>	<b>Quantity</b>	<b>Manifest #</b>	<b>Treatment / Disposal Facility</b>

## **2.2 Planning Section**

### **2.2.1 Planned Activities**

- Mobilize to the Site to set-up Site support facilities and initiate tasks required to excavate, recovery, sample, and dispose of buried drums and any associated grossly contaminated soil resulting from any release of hazardous constituents from buried drums.
- Clearing and grubbing areas of the Site planned for excavation and required for setting up support facilities.
- Improvement of haul roads and installation of pads for future drum staging area(s)
- Excavation and recovery of buried drums
- Sampling and characterization of waste and repackage for off-site disposal
- Off-site disposal of recovered wastes

### **2.2.2 Issues**

None to report at this time

## **2.3 Logistics Section**

Nothing to report at this time

## **2.4 Finance Section**

On September 25, 2017, A verbal authorization of \$100,000 for mitigation funding and \$50,000 for RST contractor funding was provided by the EPA Region 2 Emergency Response and Remediation Division's Acting Division Director to conduct initial actions at the Site. On September 29, 2017, an initial Task Order was issued to the ERRS Contractor for \$100,000.

On April 9, 2018 an Action Memorandum was approved which confirmed the initial verbal authorization for emergency action, authorized a project ceiling increase, authorized a change in scope, and a 12-month exemption. The April 9, 2018 Action Memorandum increased the project ceiling from \$150,000 to \$1,950,000, of which \$1,350,000 is for mitigation contracting.

On May 3, 2018, the EPA OSC added an additional \$60,000 to the RST Site task assignment. This addition increased RST funding to \$110,000 for Site work.

### **Estimated Costs \***

	<b>Budgeted</b>	<b>Total To Date</b>	<b>Remaining</b>	<b>% Remaining</b>
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$1,350,000.00	\$25,000.00	\$1,325,000.00	98.15%
RST 3 - Removal Support Team Contractor	\$110,000.00	\$32,000.00	\$78,000.00	70.91%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$1,460,000.00</b>	<b>\$57,000.00</b>	<b>\$1,403,000.00</b>	<b>96.10%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## **2.5 Other Command Staff**

No information to report at this time

## **3. Participating Entities**

EPA is conducting this action under its CERCLA authority. EPA has been communicating actions with the NYSDEC and will coordinate activities with NYSDEC as necessary.

## **4. Personnel On Site**

The only on-site activities during this reporting period included a Site visit between EPA and NYSDEC. No other personnel were on-site during this reporting period.

**5. Definition of Terms**

None

**6. Additional sources of information**

Nothing to report at this time

**7. Situational Reference Materials**

None at this time



# BRILLO LANDFILL

**Message Sent @ 6/7/2018 4:42:20 PM**

## Pollution Report #2 Brillo Landfill - Action Memorandum Approved and Pre-mobilization Activities

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